

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CR. NO. 05-MJ-00489-RBC
)
MICHAEL O'DONNELL)
)

GOVERNMENT'S ASSENTED-TO MOTION TO CONTINUE
PROBABLE CAUSE HEARING

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan, and Assistant U.S. Attorney Donald L. Cabell, hereby moves that the Court continue the probable cause hearing in this case, presently scheduled for September 27, 2005, to at least the afternoon of September 29 or 30, 2005. In support of the motion, the undersigned AUSA will be out of the office on the afternoon of September 27th addressing a recent family medical issue. Further, the undersigned is presently on trial in the matter of United States v. Brian Todd, Cr. No. 04-10246-PBS and thus is unavailable before 2:00 p.m. The government has spoken with counsel for the defendant and, although the parties did not discuss a mutually convenient date and time, the defendant assents to the government's motion to continue the hearing to a later date.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/Donald L. Cabell
DONALD L. CABELL
Assistant U.S. Attorney

